

February 5, 2018

**FILED ELECTRONICALLY**

The Honorable Jocelyn G. Boyd  
Chief Clerk

**South Carolina Public Service Commission**

PO Drawer 11649  
Columbia SC 29211

RE: Application Need it Moved? LLC for a Class E (Household Goods)  
Certificate of Public Convenience and Necessity  
**Docket No. 2017-333-T**

Dear Ms. Boyd:

On behalf of the Applicant, and pursuant to Commission Rule 103-834, I request that the Commission grant Applicant leave to take the deposition of a witness (or witnesses) chosen by the Applicant at a time and place to be agreed upon by the parties in the above-referenced Docket. Any such witness(es) will testify as the Applicant's shipper witness(es), and do so via deposition and in lieu of an appearance at the hearing in this case. Allowing testimony via deposition will accommodate the schedule of any such witness. I have spoken to counsel for the South Carolina Office of Regulatory Staff ("ORS") regarding this request, and the ORS does not object. Alternatively, I request that testimony of a witness (or witnesses) be conducted via phone testimony during the scheduled hearing.

The facts that Applicant seeks to establish by deposition are those that support Applicant's application in this Docket: that there is demand for household goods moving services that is not current being met.

The deposition(s) will take place at a time mutually agreed upon by the parties, via telephone or at another specified locations that is agreed upon by the parties.

With kind regards, I am

Yours truly,

s/

  
Tracy E. Pinnock, Esq.

cc: Ms. Lessie Hammond, Esq. (via electronic mail service)  
Mr. Josh Minges, Esq (via electronic mail service)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2017-333-T**

IN RE:

Application of Need It Moved? LLC for a Class  
E (Household Goods) Certificate of Public  
Convenience and Necessity

)  
)  
) **CERTIFICATE OF SERVICE**  
)  
)

This is to certify that I have caused to be served this day, one (1) copy of Request for Leave to Take Deposition or testimony via phone, by email to the below recipient:

**VIA ELECTRONIC MAIL SERVICE**

Lessie Hammonds, Esq.  
Office of Regulatory Staff  
Legal Department  
[lhammon@regstaff.sc.gov](mailto:lhammon@regstaff.sc.gov)

  
s/\_\_\_\_\_  
Tracy E. Pinnock, Esq.

February 5, 2018  
Columbia, South Carolina